

Exhibit B

The many emails confirming that service of Requests for Admissions would not be accepted by email or that acceptance or that Plaintiff was not waiving her right to future service in accordance with Rule 5.

Re: Barbounis v. MEF--4th set of Requests for Admissions

Seth Carson <seth@dereksmithlaw.com>

Thu 5/21/2020 7:54 PM

To: Benson, Leigh Ann <lbenson@cozen.com>

Cc: Walton, David <dwalton@cozen.com>; Rhym, Kia B. <krhym@cozen.com>

I do accept service of these Request for Admissions (without waiving the right to service on any other paper).

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

CONFIDENTIALITY NOTE: The information contained in this transmission is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

From: Benson, Leigh Ann <LBenson@cozen.com>
Sent: Tuesday, May 19, 2020 3:17 PM
To: Seth Carson <seth@dereksmithlaw.com>
Cc: Walton, David <DWalton@cozen.com>; Rhym, Kia B. <KRhym@cozen.com>
Subject: Barbounis v. MEF--4th set of Requests for Admissions

Seth, please see the attached Requests for Admissions directed to plaintiff Ms. Lisa Barbounis.

Can you please kindly accept service via email in light of the work-from-home limitations we are under?

Thanks,
Leigh Ann



Leigh Ann Benson
Associate | Cozen O'Connor

One Liberty Place, 1650 Market Street Suite 2800 | Philadelphia, PA 19103

P: 215-665-4708 F: 215-701-2002

[Email](#) | [Bio](#) | [LinkedIn](#) | [Map](#) | [cozen.com](#)

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

Re: Lisa Barbounis v. MEF

Seth Carson <seth@dereksmithlaw.com>

Wed 4/8/2020 1:56 AM

To: Walton, David <dwalton@cozen.com>

Cc: Benson, Leigh Ann <lbenson@cozen.com>; Sid Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>

TY!

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

CONFIDENTIALITY NOTE: The information contained in this transmission is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

From: Walton, David <DWalton@cozen.com>
Sent: Tuesday, April 7, 2020 9:55 PM
To: Seth Carson <seth@dereksmithlaw.com>
Cc: Benson, Leigh Ann <LBenson@cozen.com>; Sid Gold <sgold@discrimlaw.net>; Bill Rieser <brieser@discrimlaw.net>
Subject: Re: Lisa Barbounis v. MEF

Confirming receipt.

Enjoy the hug; they grow up fast (and then they're on electronics all day).

Sent from my iPad

On Apr 7, 2020, at 9:51 PM, Seth Carson <seth@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

Dave,

Attached is Plaintiff, Lisa Barbounis's Responses to Defendants' Second and Third Request for Admissions. I am going to try and get you Caitriona's tonight too but it might be tomorrow. My two year old is bear-hugging me as I am drafting this email.

Can you please confirm receipt by email again for the same reason I provided last night. I do not have a printer and set up to serve via mail currently.

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

CONFIDENTIALITY NOTE: The information contained in this transmission is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

<Plaintiff's Responses to Request for Admissions - Second Set.pdf>
<Plaintiff's Responses to Request for Admissions - Third Set.pdf>

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

Re: Patricia McNulty v. MEF

Walton, David <dwalton@cozen.com>

Tue 4/7/2020 11:09 AM

To: Seth Carson <seth@dereksmithlaw.com>

Cc: Benson, Leigh Ann <lbenson@cozen.com>

Agree and confirm. Stay well.

Sent from my iPad

On Apr 7, 2020, at 12:12 AM, Seth Carson <seth@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

David and Leigh,

Attached are Plaintiff, Patricia McNulty's Responses to Defendants' Second and Third Requests for Admissions. Can you please agree to accept these by email. I do not have the ability to print and send information currently. So I am only asking because of working from home due to Covid-19.

Please confirm acceptance.

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

CONFIDENTIALITY NOTE: The information contained in this transmission is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

<Plaintiff's Responses to Request for Admissions - Second Set.pdf>

<Plaintiff's Responses to Request for Admissions - Third Set.pdf>

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

Re: Patricia McNulty v. MEF et al.

Walton, David <dwalton@cozen.com>

Tue 3/3/2020 1:29 AM

To: Seth Carson <seth@dereksmithlaw.com>

No problem.

Dave Walton
Sent from my iPhone

On Mar 2, 2020, at 8:47 PM, Seth Carson <seth@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

Dave,

Attached please find Plaintiff, Patricia McNulty's Responses to Requests for Admissions along with a Verification and Certificate of Service.

Requests for Admissions must be served. Email service is not sufficient service for Request for Admissions. Just FYI, for argument's sake.

I am fine with providing responses to the requests for admissions that you sent. I am not going to try and make you serve them all over again. I will send Caitriona and Lisa's ASAP. I may need until tomorrow. I did not have the opportunity to speak with them today. I still have more work to do before I leave so I will try to get them to you tonight.

I appreciate your working with me.

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC
1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

CONFIDENTIALITY NOTE: The information contained in this transmission is privileged

and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

From: Walton, David <DWalton@cozen.com>
Sent: Monday, March 2, 2020 5:55 PM
To: Seth Carson <seth@dereksmithlaw.com>
Subject: Re: Patricia McNulty v. MEF et al.

Those dates work. We disagree that they're weren't served but it's moot because we will give you until today anyway. OK for Friday for the rest of discovery.

Also, please check the McNulty responses. They have my signature on them and a COS to be sent to you (rather than me).

Dave Walton
Sent from my iPhone

On Feb 28, 2020, at 5:50 PM, Seth Carson <seth@dereksmithlaw.com> wrote:

****EXTERNAL SENDER****

Dave,

Attached please find Plaintiff, Patricia McNulty's Responses to Defendant's Requests for Admissions.

Can I please respond to Lisa Barbounis and Caitriona Brady's Requests by Monday? I am trying to get out of here to I can go hang out with my daughter.

I owe you discovery responses on all three cases now. Can you please give me until the end of next week for the Rogs and Doc Responses. I will get you Request for Admissions (which were never served) by Monday, and the rest by the end of next week?

Seth D. Carson, Esquire
Derek Smith Law Group, PLLC

1835 Market Street
Suite 2950
Philadelphia, PA 19103
Phone: 215.391.4790
Facsimile: 215.893.5288
Direct: 484.678.2210
Email: Seth@DerekSmithLaw.com

CONFIDENTIALITY NOTE: The information contained in this transmission is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this transmission in error, do not read it. Please immediately reply to the sender that you have received this communication in error and then delete it. Thank you.

<Def. Requests for Admission (McNulty).pdf>

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.

<CERTIFICATE OF SERVICE.pdf>

<Patricia McNulty Verification - Admissions.pdf>

<Def. Requests for Admission (McNulty).pdf>

Notice: This communication, including attachments, may contain information that is confidential and protected by the attorney/client or other privileges. It constitutes non-public information intended to be conveyed only to the designated recipient(s). If the reader or recipient of this communication is not the intended recipient, an employee or agent of the intended recipient who is responsible for delivering it to the intended recipient, or you believe that you have received this communication in error, please notify the sender immediately by return e-mail and promptly delete this e-mail, including attachments without reading or saving them in any manner. The unauthorized use, dissemination, distribution, or

reproduction of this e-mail, including attachments, is prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) is not a waiver of any attorney/client or other privilege.